

**MEF Expert Designation and Report - CONTAINS ATTORNEY'S EYES ONLY MATERIAL**

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Thu 9/23/2021 10:47 PM

To: Seth Carson <seth@dereksmithlaw.com>

Cc: Barnes III, Attison <ABarnes@wiley.law>; Sidney Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>

ATTACHMENT CONTAINS ATTORNEY'S EYES ONLY MATERIAL PURSUANT TO TERMS OF  
PROTECTIVE ORDER

Seth,

Pursuant to Fed. R. Civ. P. 26(a)(2) and the Court's Scheduling Order (Dkt. No. 101), attached is Plaintiff's expert designation and report. Please note that this report in its entirety has been designated as "Attorney's Eyes Only" pursuant to the terms of the protective order.

Best,  
Adam



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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM, :  
Plaintiff, :  
v. :  
LISA REYNOLDS-BARBOUNIS, : Civil Action No.: 19-5697  
Defendant. :  
:

**PLAINTIFF'S RULE 26(A)(2) DISCLOSURE**

Plaintiff The Middle East Forum (“MEF” or “Plaintiff”), by counsel and pursuant to Fed. R. Civ. P. 26(a)(2) and this Court’s Scheduling Order, submits this Rule 26(a)(2) Disclosure.

**Expert Designations**

1. Stephen A. Holzen, Managing Director at Stout Risius Ross, LLC, 1015 15th Street NW, Suite 1050, Washington, D.C., 20005, is an expert in the fields of economic and intellectual property damages. Mr. Holzen is expected to testify regarding damages due to MEF for various contractual breaches, misappropriation of trade secrets, and other alleged actions of Defendant Lisa Reynolds-Barbounis. Mr. Holzen’s *curriculum vitae* as well as his specific opinions and the basis for those opinions are set forth in the Report of Stephen A. Holzen, attached hereto as Exhibit “1.” Mr. Holzen charges \$475.00 an hour for his services.

2. Plaintiff also reserves the right to elicit expert testimony from Jamente Cooper, who, on behalf of Contact Discovery Services, LLC, conducted a system reset analysis of a laptop that Defendant used while employed by Plaintiff. The investigation was conducted by Ms. Cooper

in August 2020. Ms. Cooper is expected to opine that a factory reset was performed on Defendant's laptop on or about August 8, 2019 and that no log files dated prior to August 8, 2019 are present on the laptop. To the extent that Ms. Cooper is called to provide expert testimony, it is based on her years of experience in the industry and her knowledge of forensic computer analysis.

3. Plaintiff reserves the right to call any experts properly identified by the Defendant and not objected to by Plaintiff.

4. Plaintiff also reserves the right to supplement this designation with additional designations of experts as permitted by the Court, by subsequent court order, by agreement of the parties, or pursuant to the Federal Rules of Civil Procedure.

Dated: September 23, 2021

THE MIDDLE EAST FORUM  
By counsel

s/ Sidney L. Gold  
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*Counsel for The Middle East Forum*

**CERTIFICATE OF SERVICE**

I hereby certify that, on September 23, 2021, I caused the foregoing to be electronically mailed with a copy sent first class mail, postage prepaid to the following counsel:

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